

### **REMARKS**

The following remarks are made in response to the Office Action mailed June 6, 2005. In the Office Action, claims 1-27 were rejected. Applicant has amended independent claims 1, 10, 17, and 25. Claims 9, 16, 21, and 24 have been canceled. Thus, claims 1-8, 10-15, 17-20, 22, 23, and 25-27 are pending in the application. Applicant notes that the rejection based upon Japan 58-174078 has been withdrawn. Applicant respectfully requests reconsideration of the application in view of the following remarks.

As amended herein, the independent claims 1, 10, 17, and 25 require a hatch formed in the vessel in the pre-located topside deck of the vessel. The '995 reference does not show such a structure. In the '995 reference, a trunk section is added to the existing topside deck. That is, new vertical longitudinal walls 23 are provided at the upper edges of the longitudinal bulkheads and new transverse walls are also attached between both ends of the new longitudinal walls. A new deck is formed above the old deck and the hatch protrudes above the new deck. Other reinforcements are provided on the topside deck to support the new longitudinal walls and the new transverse walls.

In distinction, the vessel of the present invention has a hatch formed in a pre-located deck. This provides the advantage of reducing material required for the conversion and maximizing available space on the deck. In the '995 reference, available deck space is reduced because of the trunk structure and the additional braces that must be used to support the trunk structure. In the vessel of the present invention, the hatch may be placed on the deck rather than on an elevated structure formed above the deck, thereby facilitating removal and storage of the hatch. Additionally, by forming the hatch in a pre-located topside deck, access to the central cargo area is enhanced, and the amount of overhang created by the trunk structure in the cited references is reduced. For these reasons, it is submitted that independent claims 1, 10, 17 and 25, and their respective dependent claims, are patentable over the '995 reference.

The Hagner and Garcia references fail to provide any additional teaching to render the claims obvious. The Hagner reference shows forming a double hull vessel by adding an outer

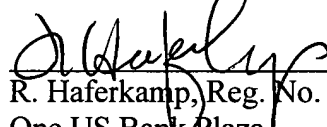
Application No. 10/803,816  
Attorney Docket No. 39356/46546

hull to the sides of the vessel. The Garcia reference is relied upon for the teaching of providing a longitudinal bulkhead in the central cargo compartment to further subdivide the cargo hold.

In view of the above, it is submitted that the claims of the application are now in a condition for allowance and notification to that effect is earnestly solicited at the Examiner's earliest convenience.

Respectfully submitted,  
Thompson Coburn LLP

By:

  
\_\_\_\_\_  
R. Haferkamp, Reg. No. 29,072  
One US Bank Plaza  
St. Louis, Missouri 63101  
(314) 552-6000  
(314) 552-7000 (fax)